# CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

## Including:

Statement Explaining How Operating Procedures Ensure Regulatory Compliance

Explanation of Any Actions against Data Brokers, and

Summary of All Customer Complaints Received

Date filed: March 1st, 2015

Name of company covered by this certification: Intermedia Voice Services, Inc.

Form 499 Filer ID: 829028

Name of signatory: Scott Allen

Title of signatory: Chief Financial Officer

Scott Allen signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Intermedia Voice Services, Inc. (Company), related to the previous calendar year, 2014.

## Certification:

I, Scott Allen, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of

CPNI procedures, training, recordkeeping, and supervisory review) set forth in 47 CFR 64.2001 et seq. of the Commission's rules.

## Annual Statement of FCC CPNI Rule Compliance

This statement serves to explain how Intermedia Voice Services, Inc. (Company) is complying with Federal Communications Commission rules related to the privacy of customer information.

## 1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use, customer data to identify what customer information is CPNI consistent with the definition of CPNI under 47 CFR 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934, as amended (47 U.S.C. § 222(f)(1)).

## 2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

## 3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use, CPNI to identify uses of CPNI not requiring customer authorization under 47 CFR 64.2005.

## 4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use, CPNI to identify uses of CPNI requiring customer authorization under 47 CFR 64.2007.

#### 5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under 47 CFR 64.2008.

#### 6. Record of Customer CPNI Approval/Non-Approval

At such time as the Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible records of whether and how a customer has responded to Opt-Out approval as required by 47 CFR 64.2009(a).

# 7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with new 47 CFR 64.2010 including, but not limited to, the following:

- The Company has established procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.
- The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with 47 CFR 64.2010(c) comprising authentication through a password established in compliance with 47 CFR 64.2010(e).
- The Company has implemented password back-up authentication procedures in compliance with 47 CFR 64.2010(e).
- The Company has established procedures to notify customers of account changes.

# 8. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under 47 CFR 64.2009(b).

# 9. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with 47 CFR 64.2009(d) and 47 CFR Part 64, Subpart U.

# 10. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with 47 CFR 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.

# **Explanation of Actions against Data Brokers**

The Company has not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

# Summary of all Customer Complaints Received

The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None.

Original signed by Scott Allen

Date: March 1, 2015

Scott Allen, CFO
Intermedia Voice Services, Inc.